

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Norfolk Division

UNITED STATES OF AMERICA	)	CRIMINAL NO. 2:19cr 172
	)	
v.	)	18 U.S.C. § 1343
	)	Wire Fraud
MARY DOENLEN,	)	(Count One)
	)	
Defendant.	)	18 U.S.C. § 981(a)(1)(C)
	)	Forfeiture

CRIMINAL INFORMATION

THE UNITED STATES ATTORNEY CHARGES THAT:

1. From in or about January 2018 and continuing through in or about November 2018, in the Eastern District of Virginia and elsewhere, the defendant, MARY DOENLEN (hereinafter “the defendant”), did knowingly and unlawfully devise and intend to devise a scheme and artifice to defraud Gallery of Homes Real Estate (“Gallery of Homes”) and for obtaining money and property from Gallery of Homes by means of materially false and fraudulent pretenses, representations, and promises, which scheme and artifice, and the execution thereof, were in substance as follows:

2. At all material times, Gallery of Homes was a real estate company located in Virginia Beach, Virginia. Gallery of Homes offered real estate brokerage services to buyers and sellers of real estate, as well as property management services to property owners in the Hampton Roads area. The property management services offered by Gallery of Homes included collecting and disbursing rental payments on behalf of property owners whose properties were managed by Gallery of Homes.

3. Between at least in or about January 2018 and in or about November 2018, the defendant worked for Gallery of Homes in an administrative role performing certain accounting duties, including managing and disbursing property management funds from the company's property management account at Fulton Bank, headquartered in Lancaster, Pennsylvania. In such capacity, the defendant was responsible for the disbursement of rental payments and other monies collected by Gallery of Homes to the owners of the properties for which Gallery of Homes provided property management services.

4. The purpose of the defendant's scheme and artifice to defraud was to embezzle, steal, and convert to her own use monies belonging to Gallery of Homes.

5. It was a part of the scheme and artifice that the defendant fraudulently made unauthorized wire transfers of funds from Gallery of Homes' property management account into a Langley Federal Credit Union ("LFCU") savings account located in Newport News, Virginia, and held jointly by the defendant and Individual #1, the defendant's close family member. The defendant then withdrew the majority of such funds in cash and deposited the cash into two separate Navy Federal Credit Union checking accounts held jointly by the defendant and Individual #1. The defendant used the fraudulently obtained funds for her own benefit.

6. It was further part of the scheme and artifice that the defendant fraudulently concealed and attempted to conceal her theft, embezzlement, and conversion of funds belonging to Gallery of Homes by creating a fictitious property address and fictitious property owner in the payment disbursement system utilized by Gallery of Homes to make it appear that said fictitious owner had received legitimate wire transfers of funds from Gallery of Homes, when in fact the defendant made unauthorized wire transfers of such funds to her jointly held LFCU savings

account for her own personal use. The defendant took such actions with the intent to defraud Gallery of Homes of money and property.

COUNT ONE

1. Paragraphs 1-6 of the General Allegations are re-incorporated and re-alleged as if fully set forth herein.

2. In furtherance of the aforesaid described scheme and artifice to defraud, on or about November 6, 2018, in the Eastern District of Virginia and elsewhere, the defendant knowingly and unlawfully caused to be transmitted by means of wire communication in interstate commerce certain signs, signals, pictures, and sounds, to wit, a transfer of funds in the amount of \$4,650.00 from Gallery of Homes' property management account located in Lancaster, Pennsylvania to the defendant's jointly held LFCU savings account located in Newport News, Virginia.

(In violation of Title 18, United States Code, Section 1343.)

FORFEITURE

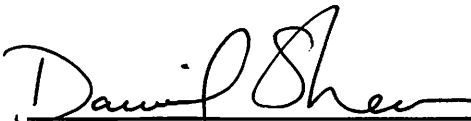
1. The defendant, if convicted of the single violation alleged in this information, shall forfeit to the United States, as part of the sentencing pursuant to Federal Rule of Criminal Procedure 32.2, any property, real or personal, which constitutes or is derived from proceeds traceable to such violation.

2. If any property that is subject to forfeiture above is not available, it is the intention of the United States to seek an order forfeiting substitute assets pursuant to Title 21, United States Code, Section 853(p) and Federal Rule of Criminal Procedure 32.2(e).

(In accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461.)

*United States v. Mary Doenlen*, 2:19cr

G. ZACHARY TERWILLIGER  
UNITED STATES ATTORNEY

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